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December 14, 2022

Via ECF

Hon. Magistrate Steven L. Tiscione
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Spooner v. Best Wireless Management LLC, et al.*
Case No.: 2:22-cv-02290 (GRB)(SLT)

Dear Judge Tiscione:

We are counsel for Plaintiff. We write jointly with counsel for Defendants to provide a status update on mediation, and to request that the stay on discovery and adjournment of all deadlines be lifted [Dkt. 28 and 29].

On November 30, 2022, the Parties conducted mediation with Raymond Nardo, Esq. The Parties were unsuccessful in settling at mediation. Therefore, we request that Your Honor lift the stay and adjournment ordered on October 12, 2022 so that Parties can continue to litigate this case.

The Parties propose the following modifications to the discovery schedule:

Deadline for completion of Rule 26(a) initial disclosures – 1/6/23;
Completion of Phase I discovery – 2/10/23;
Deadline for motions to join new parties or amended pleadings – 3/6/23;
First requests for production of documents and interrogatories due by – 3/30/23;
All non-expert fact discovery to be complete by – 9/30/23;
Expert discovery – TBD.

We thank Your Honor for considering our request.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

cc: all parties via ECF